

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:

BRANDON CALLIER,

Plaintiff,

V.

**JASCOTT ENTERPRISES, LLC,
JASCOTT INVESTMENTS, LLC, and,
JOHN DOES 1-4,**

Defendants.

CAUSE NO. 3:22-cv-00301-FM

**DECLARATION UNDER PENALTY OF PERJURY BY FARHAN SHARIAR
IN SUPPORT OF DEFENDANT JASCOTT INVESTMENT, LLC'S
OPPOSED MOTION FOR SUMMARY JUDGMENT**

I, Farhan Shariar, pursuant to 28 U.S. Code § 1746, declare under penalty of perjury, that the following facts are true and correct, to the best of my knowledge, information and belief:

1. "My name is Farhan Shariar, otherwise known for business purposes as Jack Dawson. I am employed as Operations Manager at Hello Tech Solutions Ltd., a registered Business Processing Outsourcing company based in Dhaka, Bangladesh, whose address is 229 PSC Convention Hall Rd, Dhaka 1216, Bangladesh.

2. I am over the age of 18, of sound mind and capable of understanding and making this Declaration.

3. I have personal knowledge of all of the facts and contentions stated herein, and do hereby declare and affirm that all of the facts and contentions stated herein are true and correct to the very best of my knowledge and information, and, if called as a witness, could appear and testify competently thereto.

4. Among the services Hello Tech provides is business-to-business lead generation through digital and web-based advertising.

5. Hello Tech does not cold-call or use automated dialing systems. We receive sales leads through social media from people who call us directly or from people we call directly after they apply for funding on a social media website.

6. Hello Tech has numerous entities that it uses for digital and web-based advertising, including Green Arrow Capital, which was used by Mr. Brandon Callier, to apply for a Business Loan online. (See attached).

A. Hello Tech d/b/a Green Arrow Capital.

7. I am familiar with Mr. Brandon Callier, who is listed in our database as having responded to our marketing on thirteen (13) different occasions between April 9, 2021, and July 5, 2022.

8. I spoke personally with Mr. Callier on two (2) of the thirteen (13) occasions he inquired and/or applied for a business loan.

9. On each of Mr. Callier's thirteen (13) inquiries, Mr. Callier represented to myself and my staff that he was shopping for a business loan on behalf of one of his numerous businesses: Aero Services, LLC; Aero Finance, LLC; BBA Corp; Vanity Nail Bar; or as the owner of a tax preparation service.

10. Each time Mr. Callier inquired and/or applied for a business loan, Mr. Callier provided his phone number as (915) 383-4604, and email address, callier74@gmail.com.

11. Each time Mr. Callier inquired and/or applied for a business loan, Mr. Callier affirmatively gave consent to receive telephone calls, texts and emails regarding lending offers from us, our affiliates or from third-party funding partners, which Mr. Callier requested be

communicated to his phone number, (915) 383-4604, or his email address, callier74@gmail.com.

12. Every consumer who makes an inquiry to Hello Tech is informed at the beginning of the discussion that consent to receiving promotional communications is not required as a condition of any loan approval or funding, and that the consumer may revoke this consent at any time.

13. The thirteen (13) inquiries made to Hello Tech by Mr. Callier on behalf of his various business entities were contemporaneously documented by Hello Tech, in our electronic data base, during the course of a regularly conducted business activity.

14. According to Hello Tech's contemporaneous electronic data base, the dates and purposes of Mr. Callier's other twelve (12) business inquiries were:

- a. On April 9, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a working capital loan for Fifteen Thousand Dollars (\$15,000) on behalf of his business BBA Corp, my records indicate.
- b. On June 12, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Ten Thousand Dollar (\$10,000) loan to acquire equipment for his business Aero Finance, LLC, my records state.
- c. On June 29, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Ten Thousand Dollar (\$10,000) loan to acquire additional equipment and expand his tax preparation business, my records state.
- d. On August 9, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Ten Thousand Dollar (\$10,000) loan to acquire equipment for his tax preparation business, my records indicate.
- e. On August 11, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Ten Thousand Dollar (\$10,000) working capital loan on behalf of his business, Aero Finance, LLC, an inquiry which I personally handled, my records state.
- f. On September 13, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Ten Thousand Dollar (\$10,000) loan to acquire equipment for his business, Aero Services, LLC, my records state.

- g. On October 12, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a loan for Ten Thousand Dollars (\$10,000) to acquire equipment for his business BBA Corp, my records indicate.
- h. On November 5, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Twenty-Five Thousand Dollar (\$25,000) loan to acquire equipment for a tax preparation business, my records indicate.
- i. On December 7, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Twenty Thousand Dollar (\$20,000) loan to acquire equipment for his business, Aero Services, LLC, my records state.
- j. On January 20, 2022, Mr. Callier contacted Hello Tech to inquire about obtaining a Twenty Thousand Dollar (\$20,000) loan for working capital on behalf of Aero Services, LLC, an inquiry which I personally handled, my records state.
- k. On June 28, 2022, Mr. Callier contacted Hello Tech to inquire about obtaining a Fifty Thousand Dollar (\$50,000) loan to acquire equipment for his business Vanity Nail Bar, my records indicate.
- l. On July 5, 2022, Mr. Callier contacted Hello Tech to inquire about obtaining a working capital loan for Fourteen Thousand Dollars (\$14,000) for his business BBA Corp, my records indicate.

B. Brandon Callier d/b/a Aero Services LLC.

15. Of Mr. Callier's thirteen (13) business loan inquiries made to Hello Tech, the business loan inquiry relevant to Jascott Investments, LLC, was made on April 2, 2022. This inquiry, forwarded to Jascott Investments, LLC, was in response to Hello Tech's internet marketing on behalf of "Green Arrow Capital." Green Arrow Capital is one of numerous doing business as ("dba") entities that Hello Tech utilizes. (See attached).

16. Callier's initial inquiry on April 2, 2022, consisted of completing and submitting a business loan application online, via Green Arrow Capital's website. (See attached). Specifically, Mr. Callier completed and submitted his inquiry for a business loan, by going to the "Apply Now" web page on Green Arrow Capital's website. (See attached). On the "Apply

Now" web page, Mr. Callier provided financial information about his business, "Aero Services LLC", such as its "Monthly Revenue", its "Time in business", and the "Funding Amount" requested, all of which was requested, in order to "Apply for a Business Loan Online."

17. At the bottom of the "Apply Now" web page, below the "Apply for a Business Loan Online", a notice to consumers is set forth, which reads as follows:

"By clicking the Get Funded button above, **you consent to receive calls, texts, and e-mails** via automated technology or recorded messages to any number or email address you provide regarding offers and my account by or on behalf of Greenbox Capital and its affiliates and third-party funding partners. You understand that consent to promotional communications is not required as a condition of any approval or purchase and **may be revoked** at any time by emailing info@greenboxcapital.com. Message and data rates may apply. You can also apply for business funding by contacting us at 855.442.3423. All information provided to Greenbox Capital is subject to our privacy policy."

(See attached) (emphasis added).

18. By completing and submitting his "Business Loan Online" application, Mr. Callier thus provided his consent "**to receive calls, texts, and e-mails.**"

19. In a follow-up phone call, on April 2, 2022, after submitting his "Business Loan Online" application, Mr. Callier represented to Hello Tech employee Max Williams (d/b/a Green Arrow Capital) that he was seeking a Sixty Thousand Dollar (\$60,000) loan to acquire equipment for Mr. Callier's business, Aero Services LLC. In that follow-up phone call of April 2, 2022, Max Williams obtained from Mr. Callier additional information, such as whether Mr. Callier has a history of bankruptcy filings, or outstanding debt, the reason for the loan, and how soon the financing was needed. Hello Tech requested this financial information from Mr. Callier to determine which of its affiliates or third-party funding partners are best suited to offer the financial products and services requested by business loan applicants such as Mr. Callier.

20. In the follow-up phone call of April 2, 2022, as a matter of policy, Mr. Callier was

asked if he consented to telephone contact from third-party funding sources such as INVESTMENTS. In the follow-up phone call of April 2, 2022, Mr. Callier consented to telephone contact from third-party funding sources, and therefore Mr. Callier's business loan inquiry was sent to INVESTMENTS, because we thought INVESTMENTS was a great fit, and Mr. Callier's verbal interview and online business loan application indicated he met all of the requirements for a business loan from INVESTMENTS.

21. Mr. Callier at no time before, during or after the follow-up phone call of April 2, 2022:

- a. Informed us that his phone number of (915) 383-4604 was a residential phone number;
- b. Informed us that he was on a "Do-Not-Call Registry"
- c. Informed us that he was not seeking or applying for a business loan;
- d. Informed us that he was not going to close on a business loan; or
- e. Revoked his "consent to receive calls, texts, and e-mails" from us, or from third-party funding sources;

Further Declarant Sayeth Not

###

EXECUTED on 24th January, 2024.



Farhan Shariar,
Declarant

Click Relax & Get Funded

[Apply Now](#)

Quick Funding
Within hours of approval

\$1 Billion+
Businesses across all industries

Flexible Payments
Automated payments tailored to your business needs

Your Business Need Options. We've got different loans available for you.

Green Arrow Line of Credit

Acquire a flexible credit line that can be used to efficiently manage your cash flow, whether it's for purchasing inventory or covering payroll expenses. This revolving credit line grants you customized access to cash exactly when you require it.

This line provides efficient liquidity ranging from \$10K to \$100K, and a customisable repayment term of 12 months, which can be adjusted to fit the repayment terms you prefer after each individual financing. Monthly fee is non-existent for non-prime accounts and repayments.

Medium and easily accessible funds for operational needs. Lines of credit with a maximum limit of \$100K.

[Learn More](#)

Green Arrow Term Loan

Take this loan option for making strategic investments in your business, such as funding expansion projects or moderating significant purchases. You can receive a term loan of up to 5 years, providing you with consistent funds. Additionally, once you have repaid half of the loan amount, you have the option to apply for additional funds if needed.

We provide loans with accessible funding from \$10K to \$100K, and you have the flexibility to choose repayment terms of up to 24 months. This allows you to tailor the loan structure based on your specific business needs and repayment capabilities.

Medium and easily accessible funds for operational needs. Lines of credit with a maximum limit of \$100K.

[Learn More](#)

Business Financing Solutions

Custom Financing Solutions for your small business

Asset Based Loans*

- Global asset financing needs
- From starting at \$500K up to \$100 million
- From simple to complex, up to 20 months
- From daily, weekly to monthly payments

[Find out more →](#)

Line of Credit*

- From Working Capital of \$5,000 to \$100,000
- From up to 12 months
- Approved amount determined by you
- Flexible

[Find out more →](#)

Small Business Loans*

- Loans Up to \$1 million
- Funding as fast as 24 hours
- Custom financing from 3 months to 5 years
- No collateral
- Automated daily or weekly payments
- More

[Find out more →](#)

We Fund Businesses in Most Industries

See all industries →



The perfect Combo of speed and service
And it's very easy to get started



Step 1. Complete The Application

Our application is pretty simple. You can apply online or over the phone.

Step 2. Get a Decision

Your dedicated Loan Advisor will review your options with you.

Step 3. Receive your funds

Complete our online checklist and receive your funds as soon as the same day.

Apply Online

Get Started

Give Us a Call

(347) 318-4248

Monday to Friday

9:30AM-7:30PM ET

Important Links

- About
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Newsletter

First Name:

Last Name:

I agree to the [Privacy Policy](#)

I agree to receive communications from Green Arrow



Put fast funding to work for your business. Apply for up to \$250K.

[Apply Now](#)

Lump Sum **24-Month** **Predictable**

From \$14,625* Interest only repayment terms. Daily 0.01% would be paid on principal.

Take on your next challenge with a business term loan from Green Arrow

Not all running a business is finding the missing capital to support it. You might need to fix equipment, restock or fund an expansion. Traditionally, business owners would have to burden for small business loans, but traditional business lenders require a lot of paperwork — and time that a busy entrepreneur just doesn't have.

That's where we come in.

At Green Arrow, our small business term loans can provide funding from \$1,000 to \$250,000 with repayment terms of up to 24 months. If approved, funds are disbursed on even at the same business day.* We also offer an online浆糊 loan of credit that can be used for buying funds on hand. These products can be used simultaneously for approved customers.

Benefits of OnDeck's business term loan.



Only pay for what you borrow
Interest only repayment terms. Daily 0.01% would be paid on principal.



Instant funding
Interest only repayment terms. Daily 0.01% would be paid on principal.



Build business credit
Interest only repayment terms. Daily 0.01% would be paid on principal.



Step 1: Complete the application.
Our streamlined application is designed to be completed in just a few minutes.

Step 2: Get a decision.
Your dedicated loan advisor will review your application with you.

Step 3: Receive your funds.
Complete the online electronic and without paper funds are held on the same day.

Are we a match? Check our business Term Loan requirements.

625 **1 Year** **\$100k** **Business**

Interest only repayment terms. Daily 0.01% would be paid on principal.

FAQs: Green Arrow Term Loan

How soon can I get my funds?

Green Arrow's term loan can fund to your bank account by 5:00 PM (EST) the day you've applied.* An enrollment approval 24-72 hours from a bank can take up to three business days.

Can I get more funds after my first loan?

Many Green Arrow Term Loan customers Harvey Ultra Motors, believe you can't get enough, so they've returned for their second loan. It's a whole new world you've just entered.

Can I repay my Green Arrow Term Loan early?

Yes, if you qualify for our 100% prepayment benefit option, you will pay your loan off early in full without paying an early repayment fee.

Are payments fixed or variable?

Payments for OnDeck's term loans are fixed, so you'll pay the same amount, from the beginning to the end of your repayment term. That means you'll never have to worry about your rates going up or down or your rates going up.

How does payback work?

Repaying your term loan is simple. Just log in to your account, begin your payment, and pay. The prepayment benefit or 100% prepayment benefit option is available for business and personal loans, and never applies. It's important to see if you qualify based on your individual circumstances.

What can you do with a small business term loan?

Term loans provide a lump sum of cash that is often used for large, one-time purchases. Whether you need a short-term business loan (up to 12 months) or a longer-term loan (up to 24 months), we can help. If you need a lump sum of cash for a large, one-time purchase, like equipment or a building, a term loan may be the right choice for you.

- Equipment financing
- Prepaid expenses
- Business working capital
- Short-term loans
- Long-term loans

Learn more about business term loans.

■ How do business term loans work?

■ How long are business term loans?

■ Where can I get business term loans for bad credit?

- \$1,000 to \$250,000 in term loans - up to \$250,000 in term loans for business that require up to 24 months to pay back.
- \$100 to \$10,000 in short-term loans - up to \$10,000 in short-term loans for business that require up to 12 months to pay back.
- \$100 to \$10,000 in long-term loans - up to \$10,000 in long-term loans for business that require up to 24 months to pay back.
- \$100 to \$10,000 in working capital loans - up to \$10,000 in working capital loans for business that require up to 12 months to pay back.
- \$100 to \$10,000 in equipment financing loans - up to \$10,000 in equipment financing loans for business that require up to 12 months to pay back.
- \$100 to \$10,000 in pre-paid expenses loans - up to \$10,000 in pre-paid expenses loans for business that require up to 12 months to pay back.
- \$100 to \$10,000 in short-term loans - up to \$10,000 in short-term loans for business that require up to 12 months to pay back.
- \$100 to \$10,000 in long-term loans - up to \$10,000 in long-term loans for business that require up to 24 months to pay back.
- \$100 to \$10,000 in working capital loans - up to \$10,000 in working capital loans for business that require up to 12 months to pay back.
- \$100 to \$10,000 in equipment financing loans - up to \$10,000 in equipment financing loans for business that require up to 12 months to pay back.
- \$100 to \$10,000 in pre-paid expenses loans - up to \$10,000 in pre-paid expenses loans for business that require up to 12 months to pay back.

Interest Only

Interest:

\$0.00

Interest only repayment terms. Daily 0.01% would be paid on principal.



Flexible and convenient access to working capital.
Lines of credit up to \$100K.

Revolving **12-month** **Simple**

Term of credit from 6M - 12M
repayments same month after month
with interest

Interest rates start at 10.99%
with interest

What is a business line of credit and how does it work?

A business line of credit is a type of funding that allows you to borrow funds as you need them. You can repay a newly借入的 amount at any time. It's often used when you need to cover recurring business expenses or bridge gaps between payrolls. With Green Arrow, you'll have instant access to funds as you need them. It's a flexible line of credit that helps you build your business.

Benefits of Green Arrow business line of credit

- Only pay for what you borrow
- Instant funding
- Build business credit
- Complete the application
- Get a decision
- Receive your funds

Business funding that moves at your speed.

Apply Now

Are we a match? Check our business line of credit requirements.

625 1 Year \$100K Business

FAQs: Green Arrow Business Line of Credit.

What is OnDeck Instant Funding?

Instant Funding is a fast and easy way for small business owners to access working capital to cover their expenses, projects, or one of the many expenses to offset expenses may be made with instant approval to cover funds. To learn more about your line of credit what you need and the funds in your account in seconds, 3-5 days before your business is created.

How does my line of credit payback work?

With an OnDeck Line of Credit, loans are originated and paid back with one monthly payment. You pay back your principal, plus business banking fees, plus interest on the amount you still owe. It's been paid off monthly interest-free. After the payment, you get up to 12 months to make another payment.

Can I get a credit line increase?

There are some reasons why you could apply for a second or subsequent loans. Based on your loan type, loan amount, and payment history, you may be eligible for a loan line increase.

What is OnDeck Instant Funding?

Instant Funding is a fast and easy way for small business owners to access working capital to cover their expenses. This is a fast and easy way to cover expenses may be made with instant approval to cover funds. To learn more about your line of credit what you need and the funds in your account in seconds, 3-5 days before your business is created.

How much will it cost?

The cost of your line of credit will vary based on a number of factors, including your credit history, loan amount, and interest rate. In business, an average interest rate of 10% to 12% is typical.

What other small business loans can I get in addition to my line of credit?

With a "line of credit" you can benefit from other types of small business loans, including your business line of credit, or Green Arrow's personal loans, or other types loans that provide funding for your business. These loans can be used for your business, or to help your business grow.

How can I use my line of credit to build business credit?

With your first payment, the OnDeck line of credit will help you build your business credit by helping you build a strong credit profile.

Will applying for an OnDeck Line of Credit affect my credit?

Under most circumstances, you can still open a new account, even if you have a credit history.

Learn more about business lines of credit.

- What are the types of business lines of credit?
- What's the difference between a business line of credit and a business credit card?
- What's the difference between a secured and an unsecured business line of credit?
- How to apply for a business line of credit.
- Things to know before applying for a line of credit.
- What are some ways to use a business line of credit?
- When should a business consider a line of credit?

Learn more about business lines of credit.



About us

Since 2019, we have emerged as a prominent financial institution in the United States. Our primary focus is on providing small business loans, which are designed to assist small and mid-sized businesses with their funding requirements. We specialize in delivering prompt and hassle-free working capital and addressing various financial needs that businesses may have.

What We Do

We believe that small businesses are the lifeblood of the U.S. economy, and historically have been underserved financially. Since our founding in 2019, we've been committed to making it efficient and convenient for small businesses to access financing online.

We know that a small business is more than just a credit score. That's why we pioneered the use of data analytics and digital technology to aggregate and analyze thousands of data points to assess the creditworthiness of small businesses rapidly and accurately.

We also know that small business owners don't have enough hours in the day as it is, and when they need funds, they need them right away. That's why we created a simple online application, backed by exceptional customer service – so business owners can get the funds they need, and back to running their businesses.

Our Core Principles

OnDeck supports and empowers small businesses with flexible financing solutions and world-class service. We're committed to:



The Best Customer Experience

Ensuring all aspects of a customer's OnDeck experience meet highest standards of excellence



Truthful, transparent information

Providing our customers with complete information about our products so they can make informed decisions.



Responsible business financing

Building a sustainable and scalable model of financing that enables small businesses to thrive.



Respect for Our Customers

Ensuring all aspects of a customer's OnDeck experience meet highest standards of excellence



Privacy and Data Security

Providing our customers with complete information about our products so they can make informed decisions.



Live by Green Arrow Values

Building a sustainable and scalable model of financing that enables small businesses to thrive.

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Contact Us

Contact Info

100 William Street 7th Floor New York, NY 10038 United States
(347) 318-4246
info@greenarrowcapital.com

Fill out the form below and we will
contact you as soon as possible!

Send



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SUBSCRIBE

Apply Online

FILL OUT THE FORM BELOW TO START APPLYING FOR A BUSINESS LOAN ONLINE AND GET FUNDING YOU NEED IN AS LITTLE AS 24 HOURS. ONE OF OUR FUNDING ADVISORS WILL REACH OUT TO YOU SHORTLY TO FINISH YOUR APPLICATION, LEARN MORE ABOUT YOUR BUSINESS, AND DISCUSS YOUR FUNDING AND REPAYMENT OPTIONS. WE AIM TO RESPOND TO ALL APPLICANTS WITHIN ONE HOUR (DURING REGULAR BUSINESS HOURS).

Apply for a Business Loan Online

All fields marked by an asterisk (*) are mandatory.

Funding Amount	Monthly Revenue
<input type="text" value="—"/>	<input type="text" value="—"/>
Time in business	Company Name
<input type="text" value="—"/>	<input type="text" value=""/>
First Name	Last Name
<input type="text" value=""/>	<input type="text" value=""/>
Email	Phone Number
<input type="text" value=""/>	<input type="text" value=""/>
City	Zip Code
<input type="text" value=""/>	<input type="text" value=""/>
Country	Industry
<input type="text" value="—"/>	<input type="text" value=""/>

GET FUNDED*

* By clicking the Get Funded button above, you consent to receive calls, texts, and e-mails via automated technology or recorded messages to any number or email address you provide regarding offers and my account by or on behalf of Greenbox Capital and its affiliates and third-party funding partners. You understand that consent to promotional communications is not required as a condition of any approval or purchase and may be revoked at any time by emailing info@greenboxcapital.com. Message and data rates may apply. You can also apply for business funding by contacting us at 855.342.3423. All information provided to Greenbox Capital is subject to our privacy policy.



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<input type="text" value="Your Name"/>
<input type="text" value="Your Email"/>
SUBSCRIBE